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April 26, 2021

VIA ECF

Judge William F. Kuntz, II
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Xiamen ITG Group Corp., Ltd. v. Peace Bird Trading Corp.
Civil Action No. 21-cv-0535

Dear Judge Kuntz:

We represent the Defendant, Peace Bird Trading Corp. in the above referenced matter. Pursuant to Your Honor's request, this letter shall serve to alert the Court that we are serving the motion for an Order for the following: 1) pursuant to Fed. R. Civ. Pro. 12(b)(3), 12(b)(6), 12 (b)(7) and Rule 8(a) dismissing the Petition; or, in the alternative, 2) staying the case pending the resolution of *Xiamen ITG Group Corp., Ltd. v. Peace Bird Trading Corp., et al.* Civil Action No. 19-CV-6524; or, in the alternative, 3) consolidating this matter with *Xiamen ITG Group Corp., Ltd. v. Peace Bird Trading Corp., et al.* Civil Action No. 19-CV-6524 pursuant to Fed. R. Civ. Pro. 42(a).

We are serving the following documents upon Plaintiff's counsel: 1) Notice of Motion; 2) Declaration of Michael S. Horn with Exhibits; 3) Declaration of Brian Wu; 4) Brief in Support of Motion to Dismiss; and 5) a Proposed Order. We shall refrain from filing the papers until the motion is fully briefed. On July 2, 2021, by 5:00 pm we shall overnight courtesy copies of all paper to the Court, to the attention of Alexis Love.

Thank you.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael S. Horn", with a stylized flourish at the end.

MICHAEL HORN

cc: Counsel of Record (Via ECF)
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